

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

NATHAN ROBERTS, et al.,)	CASE NO. 1:23CV1597
)	
Plaintiffs,)	JUDGE PATRICIA A. GAUGHAN
)	
v.)	Magistrate Judge James E. Grimes, Jr.
)	
PROGRESSIVE PREFERRED)	<u>JOINT STIPULATION TO EXTEND</u>
INSURANCE COMPANY, et al.,)	<u>DEADLINE TO ANSWER OR</u>
)	<u>OTHERWISE MOVE</u>
Defendants.)	

Plaintiffs Nathan Roberts and Freedom Truck Dispatch LLC (collectively, “Plaintiffs”) and Defendants Progressive Insurance Company, Progressive Casualty Insurance Company, and Circular Board Inc.¹ (collectively, “Defendants”) have jointly agreed to a schedule (subject to this Court’s approval) for briefing Defendants’ motions to dismiss Plaintiffs’ Class-Action Complaint (“Complaint”) [Doc. 1], in which Plaintiffs allege that Defendants violated a federal civil rights statute, 42 U.S.C. § 1981, in connection with a grant program for Black-owned small businesses. Plaintiffs have not yet served the Complaint, and Defendants have agreed to waive formal service as part of the parties’ agreement to the following deadlines:

- Defendants’ Motions to Dismiss and Memoranda in Support: **December 13, 2023**
- Plaintiffs’ Opposition(s): **February 14, 2024**
- Defendants’ Replies: **March 15, 2024**

This agreed briefing schedule will allow the parties sufficient time to brief the legal issues raised by the Complaint, will streamline briefing for the multiple parties in this action, will not unduly delay this case, and will avoid costs associated with formal service of process. The parties

¹ The Complaint names “Circular Board LLC” as a Defendant, but the correct name of the entity is Circular Board Inc.

So Ordered.
/s/ Patricia A. Gaughan
9/29/23